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REMARKS

These remarks are in response to the Office Action dated December 27, 2007, which has a shortened statutory period for response set to expire March 27, 2008. A one-month extension, to expire April 28, 2008 (April 27, 2008 being a Sunday), is requested in a petition filed herewith.

Claims

Claims 1-45 are pending in the above-identified application. Claims 1-45 are rejected over prior art. Claims 16-30 and 42 remain as previously presented, and Claims 1-15, 31-41, and 43-45 remain as originally filed. Reconsideration is requested.

Rejections Under 35 U.S.C. § 102

Claims 14-15 and 29-30 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,124,374 (Haken).

Applicant respectfully traverses.

The standard for anticipation is set forth in M.P.E.P. § 2131 as follows:

> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicant incorporates herein by reference his arguments with respect to Claim 1 filed with the response dated October 5, 2007. In particular, Haken does not disclose a pointing device control method that includes the step of "remapping the pointing device to the other one of the displays," as recited by original Claim 1. In Haken, no remapping occurs when the cursor is moved between displays. The Examiner appears to agree with Applicant in section 6 of the current office action by stating that "Haken fails to distinctly point out remapping since he uses a relative pointing device."

Claims 14-15 and 29-30 depend either directly or indirectly from Claim 1 and include all the limitations of Claim 1. Because Haken does not disclose all the limitations of Claim 1,

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Haken also does not disclose all the limitations of Claims 14-15 and 29-30. Therefore, Haken does not anticipate Claims 14-15 and 29-30.

For the above reasons Applicant requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 102.

Rejections Under 35 U.S.C. § 103

Claims 1-11, 16-26, 31-33, and 37-45 are rejected under 35 U.S.C. § 103 as being unpatentable over Haken in view of U.S. Patent No. 6,842,795 (Keller).

Claims 1-11 and 16-26:

With regard to Claim 1, the Examiner writes (in part):

> Haken fails to distinctly point out remapping since he uses a
> relative pointing device. However, Keller teaches remapping the
> pointing device to the other one of the displays (Column 4 lines 1-
> 31; shifting focus with an input device, (stylus)). Therefore, it
> would have been obvious to an artisan at the time of the invention
> to combine the teaching of Keller with the method of Haken.
> Motivation to do so would have been to provide more accurate
> representation than relative methods.

Applicant respectfully traverses.

M.P.E.P. § 2142 sets forth the procedural framework for the examination process of determining obviousness:

> The examiner bears the initial burden of factually supporting any
> *prima facie* conclusion of obviousness. If the examiner does not
> produce a *prima facie* case, the applicant is under no obligation to
> submit evidence of nonobviousness. If, however, the examiner
> does produce a *prima facie* case, the burden of coming forward
> with evidence or arguments shifts to the applicant who may submit
> additional evidence of nonobviousness.

M.P.E.P. §2143 sets forth the requirements of a *prima facie* case of obviousness:

> To establish a *prima facie* case of obviousness, three basic
> criteria must be met. First, there must be some suggestion or
> motivation, either in the references themselves or in the knowledge
> generally available to one of ordinary skill in the art, to modify the
> reference or to combine reference teachings. Second, there must
> be a reasonable expectation of success. Finally, the prior art

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reference (or references when combined) must teach or suggest all the claim limitations.

Thus, if any element of the *prima facie* case of obviousness is not met, the obviousness rejection is improper and should be withdrawn.

As originally filed, Claim 1 recited (in part) the step of "remapping the pointing device to the other one of the displays." As indicated by the Examiner, Haken does not disclose this step. In addition, Keller also does not disclose this step. Rather, like Haken, Keller discloses a system and method that merely moves a cursor controlled by a pointing device between two display screens based on data indicating the direction and distance that the cursor is moved. Therefore, "shifting focus" as used in Keller is not the same as "remapping the pointing device" as recited by Claim 1.

In Keller, no remapping of the display occurs when the cursor is moved between the computer 102 and the PDA 104. Rather, movement of the cursor 120 between the computer 102 and the PDA 104 depends on the relative movement of the cursor 120 between the computer 102 and the PDA 104.

Keller illustrates that no remapping of the display occurs in his description of FIG. 6 at column 10, lines 18-49, which provides the following:

> Reference is now made to FIG. 6, where a flow chart 210 is shown which represents the operation of a second embodiment of the present invention. The particular arrangement of elements in the flow chart 210 is not meant to imply a fixed order to the steps; embodiments of the present invention can be practiced in any order that is practicable. **The method 210 is particularly suited for embodiments where the cursor 120 may appear on different displays (e.g., the cursor may appear on the display 110 of the computer 102 and the display 116 of the PDA 104).** Note that the cursor may take different forms, looks, colors, sizes, shapes, etc. when changing from a position on a first display to a position on a second display. Thus, the PDA 104 may display the cursor 120 differently on the display 116 than the computer 102 does on the display 110.
>
> The method 210 includes the steps 202 and 204 previously discussed above. In addition, the method 210 includes a step 212 during which position of a cursor 120 is changed from a first display to a second display **as the cursor 120 "leaves" the first display.** For example, in the example previously discussed above with regard to FIG. 1, moving the cursor 120 to or along the right edge 122 of the display 110 may cause the cursor 120 to stop

> appearing on the display 110 of the computer 102 and start
> appearing on the display 116 of the PDA 104. **The mark 126 on
> the display 116 indicates that the cursor 120 is starting to
> appear on the display 116 and disappear from the display 110.**
> **During a step 214, focus is shifted from the first display
> to the second display as the cursor 120 leaves the first display
> (e.g., when some or all of the cursor is no longer shown or no
> longer appears on the first display) and enters the second
> display (e.g., when some or all of the cursor now appears on
> the second display).** (emphasis added)

A similar description of the movement of cursor 120 also appears at column 6, lines 22-34, which provides:

> In some embodiments, movement of the cursor 120 along
> or in the right edge or side 122 of the display 110 may cause the
> cursor 120 to appear on the display 116 of the PDA 104, as
> illustrated by the mark 126 on the display 116. **The cursor 120
> may immediately shift or appear to move from the display 110
> to the display 116 or gradually shift or appear to move from the**
> display 110 to the display 116. **Further movements of the mouse
> 112 may cause the cursor 120 to change position on the display
> 116 of the PDA 104.** The focus of activity will remain on the PDA
> 104, and/or software operating on the PDA 104, until such time as
> the cursor 120 is positioned along the left edge or side 128 of the
> display 116.

Thus, the input of cursor 120 is simply redirected between the displays of the various devices. Indeed, there is no correlation (i.e., mapping) between a physical location of the pointing device and a corresponding location of the pointer on a display in Keller.

For at least the above reasons, Applicant respectfully asserts that the cited prior art does not teach or suggest the step of "remapping the pointing device to the other one of the displays," as recited by Claim 1.

In addition, modifying either of Haken or Keller to arrive at the invention of Claim 1 would frustrate the intended use of both of Haken and Keller. Because such a modification would frustrate the cited prior arts' intended uses, there is no suggestion or motivation to modify the cited prior art and there is no reasonable expectation of success in making such a modification.

First, with regard to Haken, no remapping of the display occurs when the cursor is moved between displays. Rather, movement of the cursor in Haken depends on its present location on

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the screen (i.e., its starting point) and the relative movement input from the mouse. In his prior

response, Applicant cited a passage from Haken at column 3, lines 45-55, which provided:

> By way of example, in the Figures, moving the cursor to the top of
> the screen 310 will, **seamlessly transfer** the output of the mouse to
> the video camera's native interface and cause a highlighted entry to
> move to the bottom of a menu list on the camera LCD screen 210a.
> **Further movement of the mouse in the same direction** will then
> cause the highlighting to move up the menu list on the camera
> LCD screen. Similarly moving the cursor to the lower right edge
> of 300 of the CRT screen 12 will transfer the mouse input to the
> native interface of the PDA and enable the user to move the cursor
> on the PDA screen. (emphasis added)

In addition, at column 4, lines 7-14, Haken also provides the following:

> When possible, the cursor on the display of the connected device
> can have the same size and/or shape as the cursor on the screen 12
> in order **to further enhance the impression that a single cursor
> has actually moved across**. Thus, as control is transferred to the
> PDA 200, a matching cursor 302 can be generated on the left edge
> 315 of the PDA screen 200a **directly opposite** the point on the
> edge 300 of CRT screen 12 where the cursor 102 was last seen.
> (emphasis added)

Because the mouse input is simply redirected between various devices, Haken creates the

impression that a cursor is seamlessly transferred between displays. However, if the cursor 102

of Haken was "remapped" to a second screen, then the cursor would not be seamlessly

transferred to the new device's screen. Rather, the cursor would appear to jump from the right

edge of the CRT screen 12 to the right edge of PDA screen 200a. This would not "seamlessly

transfer" the cursor 102 or "give the impression that a single cursor has actually moved across"

the screens, which would be contrary to the goals of Haken and frustrate its operation.

Like Haken, modifying Keller would lead to similar frustration. As described above, the

cursor of Keller moves from the point 124 on the computer screen 110 to the point 126 on the

PDA's screen 116 (*Keller*, col. 6, lines 3-34; col. 10, lines 41-43). However, if the cursor 120 of

Keller was "remapped" to a second display, then the cursor would not move from the mark 124

on display 110 to the mark 126 on the display 116. Rather, the cursor would appear to jump

from the right edge of the screen 110 to the right edge of the screen 116.

Indeed, it appears that if either Haken or Keller were modified such that their cursors

were remapped to different displays, then the smooth transition between displays that both

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Haken and Keller seek would not be possible. Therefore, neither Haken nor Keller provide a suggestion or motivation for modification for remapping the position of a pointing device between displays, and there is no reasonable expectation of success given the probable frustration of Haken and Keller's goals.

Because the cited prior art does not (1) teach or suggest all the limitations of Claim 1, (2) provide a motivation or suggestion for modification to arrive at Claim 1, and (3) provide an indication that such a modification would be reasonable successful, no prima facie case obviousness can be established with respect to Claim 1. Claims 2-11 and 16-26 depend either directly or indirectly from Claim 1 and are, therefore, distinguished from the cited prior art for at least the same reasons provided above with respect to Claim 1.

Claims 31-33 and 37:

Original Claim 31 recites (in part) "a position field containing data representing a position for triggering a process for remapping a pointing device to another display." For at least the same reasons provided above with respect to Claim 1, Applicant respectfully asserts that no prima facie case of obviousness is established with respect to Claim 31. Claims 32-33 and 37 depend directly from Claim 31 and are, therefore, distinguished from the cited prior art for at least the same reasons as Claim 31.

Claim 38:

Original Claim 38 recites (in part) "a remapper responsive to output from said position monitor, and operative to automatically remap the pointing device from one of the displays to another one of the displays." Therefore, for the same reasons provided above with respect to Claim 1, no prima facie case of obviousness is established with respect to Claim 38.

Claim 39:

Original Claim 39 recites (in part) "means for automatically remapping the pointing device from one of the displays to another one of the displays." Therefore, for the same reasons provided above with respect to Claim 1, no prima facie case of obviousness is established with respect to Claim 39.

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<u>Claims 40-41:</u>

Original Claim 40 recites (in part) the step of "automatically remapping the
pointing device to a second display." Therefore, for the same reasons provided above
with respect to Claim 1, no prima facie case of obviousness is established with respect to
Claim 40. Claim 41 depends directly from Claim 40 and is, therefore, distinguished from
the cited prior art for at least the same reasons as Claim 40.

<u>Claims 42-45:</u>

As previously presented, Claim 42 recites (in part) "wherein said data contained
in said second field is further indicative of a location for triggering a process for
remapping a pointing device between said second display and said particular display."
Therefore, for the same reasons provided above with respect to Claim 1, no prima facie
case of obviousness can be established with respect to Claim 42. Claims 43-45 depend
either directly or indirectly from Claim 42 and are, therefore, distinguished from the cited
prior art for at least the same reasons as Claim 42.

<u>Claims 12-13, 27-28, and 34-36:</u>

Claims 12-13, 27-28, and 34-36 are rejected under 35 U.S.C. § 103 as being unpatentable
over Haken in view of Keller and further in view of U.S. Patent No. 5,990,893 (Numazaki).

<u>Claims 12-13 and 27-28:</u>

For the reasons provided above with respect to Claim 1, neither Haken nor Keller teach
or suggest the step of "remapping the pointing device to the other one of the displays," as recited
by Claim 1. Similarly, Numazaki also does not teach or suggest such a step. Therefore, because
the cited prior art does not teach or suggest all the elements of Claim 1, no prima facie case of
obviousness is established with respect to Claim 1. Claims 12-13 and 27-28 depend either
directly or indirectly from Claim 1 and are distinguished from the cited prior art for at least the
reasons provided above with respect to Claim 1.

In addition, Numazaki does not teach or suggest the step of "determining how long the
pointing device has indicated the position corresponding to the other one of the displays," as

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recited by Claim 12. Rather, Numazaki analyzes the relative position changes ("the gesture") of a pointer 10 when it is in a particular region and then performs an operation that is associated with the particular gesture, such as opening a file. In addition, the time series pattern analyzing means 8 does not determine the length of time the pointer 10 is in a particular region 13, but rather analyzes the relative change in the pointer 10's position in a region 13 in order to prevent simple movements of the pointer 10 through the region 13 (e.g., vertical, horizontal or oblique passes) from being interpreted by the processing section 5 as indicating a specific operation. (See *Numazaki*, col. 5, lines 15-30; col. 7, lines 43-51; col. 8, lines 22-31). Therefore, Numazaki does not determine the length of time that a pointer 10 is in a particular region 13.

Because the prior art does not teach all the elements of Claim 12, no prima facie case of obviousness is established with respect to Claim 12. Claim 27 depends from Claim 12 and is distinguished from the cited prior art for at least the same reasons as Claim 12.

Numazaki also does not teach or suggest a step of "setting an elapsed time which the pointing device must remain indicating a position near an edge before the pointing device is remapped," as recited by Claim 13. As described above with respect to Claim 12, the time series pattern analyzing means 8 of Numazaki does not store time data. Therefore, because the prior art does not teach all the elements of Claim 13, no prima facie case of obviousness is established with respect to Claim 13. Claim 28 depends from Claim 13 and is distinguished from the cited prior art for at least the same reasons as Claim 13.

Claims 33-36:

For the reasons provided above with respect to Claim 31, neither Haken nor Keller teach or suggest a data structure containing "a position field containing data representing a position for triggering a process for remapping a pointing device to another display," as recited by Claim 31. Similarly, Numazaki also does not teach or suggest such a data structure. Therefore, because the cited prior art does not teach or suggest all the elements of Claim 31, no prima facie case of obviousness is established with respect to Claim 31. Claims 33-36 depend either directly or indirectly from Claim 31 and are distinguished from the cited prior art for at least the reasons provided above with respect to Claim 31.

In addition, as originally filed, Claim 34 recites (in part) "a preset time field containing data representing an activation time period," Claim 35 recites (in part) "an elapsed time field

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containing data representing an elapsed time," and Claim 36 recites (in part) "wherein **the elapsed time** is a time which a pointing device has remained in a designated zone." (Emphasis added). As described above with respect to Claim 12, the time series pattern analyzing means 8 of Numazaki does not monitor the length of time that the pointer 10 is in a particular region 13. Therefore, because the cited prior art does not teach or suggest all the elements of any of Claims 34-36, no prima facie case of obviousness is established with respect to any of Claims 34-36.

For the above reasons Applicant requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103.

For the foregoing reasons, Applicant believes Claims 1-45 are in condition for allowance. Should the Examiner undertake any action other than allowance of Claims 1-45, or if the Examiner has any questions or suggestions for expediting the prosecution of this application, the Examiner is requested to contact Applicant's attorney at (269) 279-8820.

Respectfully submitted,

Date: 4/28/08

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Larry E. Henneman, Jr.

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